



COONBROOK ROAD, P.O. BOX 69
PETERSBURG, NEW YORK 12138

FAX: (516) 858-3204

TELEX: 220883 TA UR

TELEPHONE: (516) 858-3202

ORDER DEPARTMENT: 1-800-833-1805

Rensselaer County Dept. of Health
County Office Building
Troy, NY 12180

Attn: Dave Wilber

May 31, 1989

Dear Mr. Wilber:

Persuant to our phone conversation, I am forwarding copies of the SPDES permit recently issued to Taconic Plastics, along with a design summary and our drawing #EPA 00004 which has been reviewed and stamped by Mr. William L. Cottrell.

As we discussed, this system will be used for industrial discharge only; no sanitary facilities will exist on the West end of the building; RCDOH-approved sanitary facilities already exist at the East end of Plant #2; and there are no proposed changes in employee count.

We hope to obtain approval of this system from your department as soon as possible so that we may start operations at Plant #4. Please contact me if you need additional information.

Sincerely Yours,

Harvey V. Teal
Technical Director

MANUFACTURERS OF HIGH TEMPERATURE SPECIALTIES

TAC EPA 00131

000122

DEC PERMIT NUMBER 4-3834-4/6-0
FACILITY/PROGRAM NUMBER(s) SPDES # NY-0223107 Air #'s 000G; 000H


PERMIT

Under the Environmental Conservation Law

EFFECTIVE DATE May 15, 1989
EXPIRATION DATE(s) May 15, 1994 SPDES MAY 15, 1990 AIR

<input type="checkbox"/> Article 15, Title 3; 6NYCRR 327, 328, 329: Aquatic Pesticides	<input type="checkbox"/> 6NYCRR 60B: Water Quality Certification	<input type="checkbox"/> Article 25: Tidal Wetlands
<input type="checkbox"/> Article 15, Title 5: Protection of Water	<input checked="" type="checkbox"/> N Article 17, Titles 7, 8: SPDES	<input type="checkbox"/> Article 27, Title 7; 6NYCRR 360: Solid Waste Management*
<input type="checkbox"/> Article 15, Title 15: Water Supply	<input checked="" type="checkbox"/> C/O Article 19: Air Pollution Control*	<input type="checkbox"/> Article 27, Title 9; 6NYCRR 373: Hazardous Waste Management
<input type="checkbox"/> Article 15, Title 15: Water Transport	<input type="checkbox"/> Article 23, Title 27: Mined Land Reclamation	<input type="checkbox"/> Article 34: Coastal Erosion Management
<input type="checkbox"/> Article 15, Title 15: Long Island Wells	<input type="checkbox"/> Article 24: Freshwater Wetlands	<input type="checkbox"/> Article 36: Floodplain Management
<input type="checkbox"/> Article 15, Title 27: Wild, Scenic and Recreational Rivers	N—New, R—Renewal, M—Modification, C—Construct (*only), O—Operate (*only)	<input type="checkbox"/> Articles 1, 3, 17, 19, 27, 37; 6NYCRR 380: Radiation Control

PERMIT ISSUED TO Taconic Plastics, Ltd.			
ADDRESS OF PERMITTEE P.O. Box 69, Petersburg, NY 12138			
AGENT FOR PERMITTEE/CONTACT PERSON Harvey Teal, Technical Director		TELEPHONE NUMBER 518-658-3202	
NAME AND ADDRESS OF PROJECT/FACILITY (If different from Permittee)			
LOCATION OF PROJECT/FACILITY Coonbrook Road	COUNTY Rensselaer	TOWN/CITY/VILLAGE Petersburg (T)	UTM COORDINATES
DESCRIPTION OF AUTHORIZED ACTIVITY Discharge 100 gpd of process wastewater to groundwaters as per attached SPDES			
Permit. Construct air emission points 000G and 000H, and after inspection, operate			
said emission points as per attached Air Pollution Control Permit.			

GENERAL CONDITIONS

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations and the conditions specified herein or attached hereto.

- The permittee shall file in the office of the appropriate regional permit administrator, or other office designated in the special conditions, a notice of intention to commence work at least 48 hours in advance of the time of commencement and shall also notify him/her promptly in writing of the completion of the work.
- The permitted work shall be subject to inspection by an authorized representative of the Department of Environmental Conservation which may order the work suspended if the public interest so requires pursuant to ECL §71-0301 and SAPA §401(3).
- The permittee has accepted expressly, by the execution of the application, the full legal responsibility for all damages, direct or indirect, of whatever nature, and by whomsoever suffered, arising out of the project described herein and has agreed to indemnify and save harmless the State from suits, actions, damages and costs of every name and description resulting from the said project.
- The Department reserves the right to modify, suspend or revoke this permit at any time after due notice, and, if requested, hold a hearing when:
 - the scope of the project is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations are found; or
 - the permit was obtained by misrepresentation or failure to disclose relevant facts; or
 - newly discovered information or significant physical changes are discovered since the permit was issued.
- The permittee is responsible for keeping the permit active by submitting a renewal application, including any forms, fees or supplemental information which may be required by the Department, no later than 30 days (180 days for SPDES or Solid or Hazardous Waste Management permits) prior to the expiration date.
- This permit shall not be construed as conveying to the applicant any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work or as authorizing the impairment of any rights, title or interest in real or personal property held or vested in a person not a party to the permit.
- The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way which may be required for this project.
- Issuance of this permit by the Department does not, unless expressly provided for, modify, supersede or rescind an order on consent or determination by the Commissioner issued heretofore by the Department or any of the terms, conditions, or requirements contained in such order or determination.
- Any modification of this permit granted by the Department must be in writing and attached hereto.

PERMIT ISSUANCE DATE May 8, 1989	PERMIT ADMINISTRATOR William J. Clarke	ADDRESS 2176 Guelderland Avenue Schenectady, NY 12306
AUTHORIZED SIGNATURE <i>William J. Clarke</i>		Page 1 of <u>7</u>

Definition of Daily Average and Daily Maximum

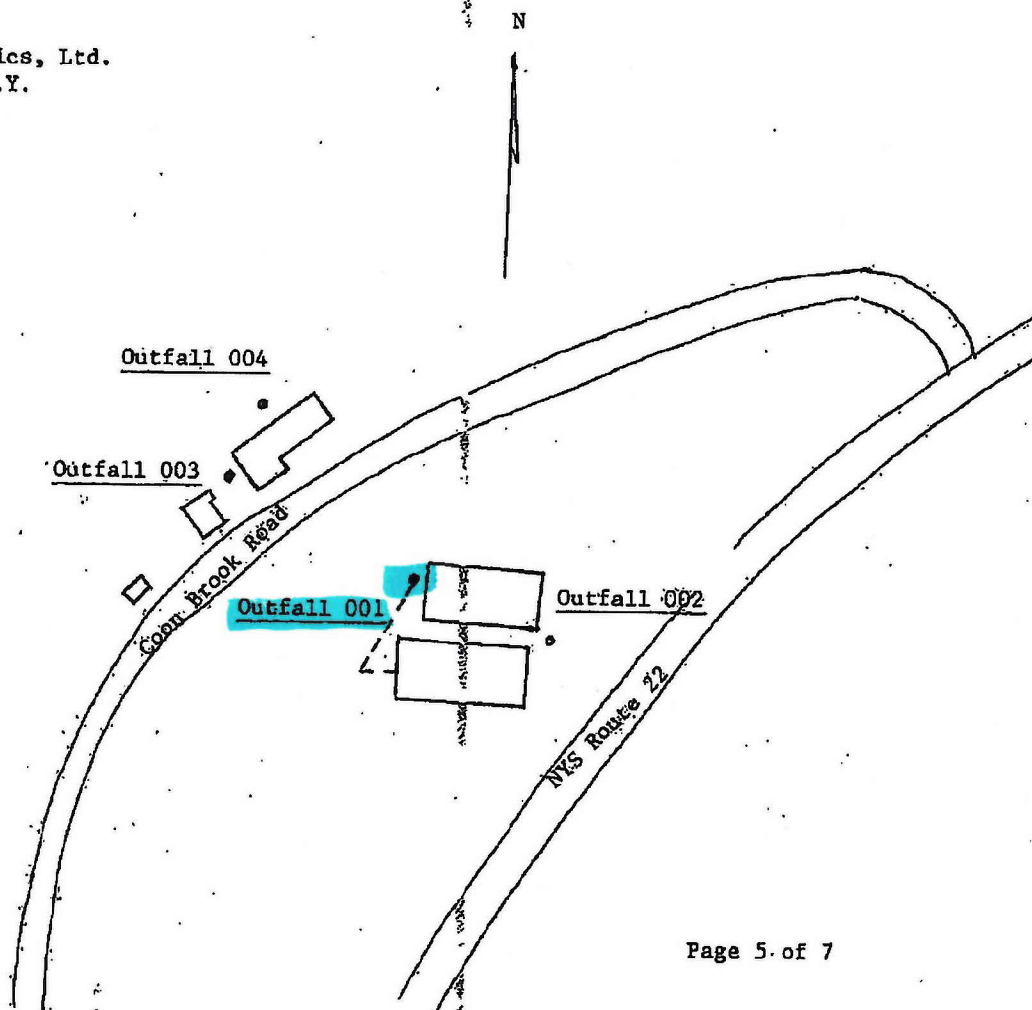
The daily average discharge is the total discharge by weight or in other appropriate units as specified herein, during a calendar month divided by the number of days in the month that the production or commercial facility was operating. Where less than daily sampling is required by this permit, the daily average discharge shall be determined by the summation of all the measured daily discharges in appropriate units as specified herein divided by the number of days during the calendar month when the measurements were made.

The daily maximum discharge means the total discharge by weight or in other appropriate units as specified herein, during any calendar day.

Monitoring Locations

Permittee shall take samples and measurements to meet the monitoring requirements at the location(s) indicated below:
(Show locations of outfalls with sketch or flow diagram as appropriate).

Taconic Plastics, Ltd.
Petersburg, N.Y.



DEC #4-3834-4/6-0

Page 5 of 7

Item 9. Explain how all Facility process water and wastewater is handled, discharged and/or disposed.

Process Water

Process water, as well as the main water supply for the plant, is supplied by the following;

- Buildings 2/4; Well #1 (362 feet deep)
- Buildings 4/5; Well #2 (400 feet deep)
- Buildings 6/9/10/11; Well #3 (60 feet deep)
- Building 1; Russell Road Surface Water Pond

Process Wastewater

Taconic has, since 1961, manufactured PTFE coated fabrics. PTFE historically contained approximately 1% PFOA as a processing agent (since 2013 PTFE used by Taconic no longer contained PFOA). At the facility, PTFE is mixed with water supplied by the plant wells, and additives, such as ammonia, formic acid, surfactants, and pigments. The PTFE mixture is then pumped into long shallow dip pans at the base of each surface coating oven. Raw fiberglass fabric is unrolled and pulled into the dip pan. As the PTFE mixture coats the fiberglass, the fiberglass is pulled vertically up through the surface coating oven, where it is dried, baked, and then sintered. The coated fiberglass is re-rolled back from the top of the oven and the process is repeated multiple times to place multiple coats of the PTFE mixture on the fiberglass.

After the completion of a PTFE mixture run, mixtures left over in the dip pans are pumped into drums and sent offsite as non-hazardous waste.

Wastewater from the PTFE surface coating oven process is primarily generated by the rinsing of the dip pans with spray water hoses, supplied by the plant wells, after residual mixtures have been pumped into drums for offsite disposal. In addition, wastewater is generated from the rinsing of pails and pans with spray water hoses, supplied by the plant wells, done in industrial and laboratory sinks. Lastly, wastewater is also generated from the mopping of the production floors in the surface coating oven manufacturing areas.

Wastewater generated from Oven Rooms 4 and 5, and the laboratory sinks is pumped directly into the onsite Wastewater Treatment Plant (WWTP) storage tank located in Oven Room 4. Wastewater generated from Oven Room 6 is pumped into an underground storage tank inside the oven room. Wastewater generated from Oven Room 11 is pumped into an aboveground storage tank inside the oven room. Wastewater from Oven Rooms 6 and 11 is then pumped into a small tank truck and is transported to Building 4. Wastewater is unloaded outside of Building 4 and pumped into the WWTP storage tank located inside Oven Room 4.

Wastewater effluent from the onsite WWTP is pumped into a receiving tank located in Oven Room 4. From this tank, the wastewater is pumped directly to the air pollution control device for Oven Rooms 4 and 5, Fume Eliminator #5, where it is used as the water curtain inside the fume eliminator inlet chamber. The water is recycled inside the fume eliminator.

The fume eliminator is cleaned out on a regular basis. Liquid and solid wastes are pumped out of the fume eliminator sump by a 3rd party vacuum truck and disposed offsite as non-hazardous waste.

Item 10. *Identify the locations of all septic systems currently or formerly used by the Facility, including leach fields, the dates of use and the materials discharged into such system.*

Please see the SPDES Permit provided in response to Item 2 above and the CHA Reports provided in response to Item 3 above. Please also see the facility's General Permit (Numbered 000084 – 000097.

Item 11. *Describe the corporate or legal relationship between Tonoga, Inc. dba Taconic, Tonoga Limited, Tonoga Brazil, and any other affiliated corporate entity related to the operations at the Facility. In addition, please provide a chronology showing the acquisitions, mergers, or dissolutions involving these companies.*

Tonoga, Inc. d/b/a Taconic (the "Company") is a Delaware corporation. The Company is a successor in interest to Tonoga Limited, a Republic of Ireland corporation, which is a successor in interest to Taconic Plastics Limited, a United Kingdom corporation, which is a successor in interest to Taconic Plastics Inc., a New York corporation. The Company's history is summarized as follows:

- 1969 - Taconic Plastics Inc. was founded (Incorporated in New York)
- 1981 - Taconic Plastics Limited d/b/a Taconic Plastics was incorporated in United Kingdom ("Taconic UK"). Taconic UK purchased all of the assets and assumed all of the liabilities of Taconic Plastics Inc. Taconic Plastics Inc. was subsequently liquidated.
- 1991 - Tonoga Limited d/b/a Taconic Plastics was incorporated in the Republic of Ireland ("Taconic Ireland"). Taconic Ireland acquired all of the assets and assumed all of the liabilities of Taconic UK. Taconic UK was subsequently liquidated.
- 2002 - Tonoga, Inc. d/b/a Taconic (the Company) was incorporated in Delaware. The Company acquired all of the assets and assumed all of the liabilities of Taconic Ireland. Taconic Ireland was subsequently liquidated.

Tonoga Brazil Holdings LLC ("Tonoga Brazil") is a Delaware limited liability company that is wholly-owned by the Company. Tonoga Brazil is a holding company that owns all of the stock of a company that operates in Brazil. The activities of Tonoga Brazil and its subsidiary are not related in any way to the operation of the facility.

Item 12. *Describe when Tonoga, Inc. dba Taconic first discovered that PFOA, PTFE, or its constituents were potentially hazardous or toxic, and provide any and all documents related to such discovery.*

In 2003, Taconic learned that EPA had expressed concern about PFOA. At the time, EPA said there was insufficient scientific evidence to recommend consumers stop using products made with PFOA. Thus, EPA chose not to regulate the compound or provide exposure limits. Despite

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning EDPand lasting until ExpD

the discharges from the permitted facility shall be limited and monitored by the permittee as specified below:

Outfall Number & Effluent Parameter	Discharge Limitations		Units	Minimum Monitoring Requirements	
	Daily Avg.	Daily Max.		Measurement Frequency	Sample Type
<u>Outfall 001 - Process Wastewater</u>					
Flow		Monitor	gpd	Quarterly	Estimate
Nitrogen, Ammonia		Monitor	mg/l	Quarterly	Grab
Foaming Agents (MBAS)		1.0	mg/l	Quarterly	Grab
pH (range)	6.5 - 8.5		su	Quarterly	Grab

Outfalls 002 and 003

Sanitary wastewater to groundwater.

2/4/94

FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTSDuring the Period Beginning May 15, 1989and lasting until May 15, 1994

the discharges from the permitted facility shall be limited and monitored by the permittee as specified below:

Outfall Number & Effluent Parameter	Gross Discharge Limitations		Units	Minimum Monitoring Requirements	
	Daily Avg.	Daily Max.		Measurement Frequency	Sample Type
<u>Outfall 001 - Process Wastewater</u>					
Flow	Monitor	Monitor	gpd	Quarterly	Measured
Nitrogen, Ammonia	Monitor	Monitor	mg/l	Quarterly	Grab
Foaming Agents (MBAS)	Monitor	1.0	mg/l	Quarterly	Grab

Outfalls 002, 003, and 004:

(Sanitary waste only to groundwater)

From: Ripstein, Deanna (HEALTH) <deanna.ripstein@health.ny.gov>
Sent: Friday, February 19, 2016 7:36 PM
To: berlinsupervisor@fairpoint.net
Cc: mwinn@taconic.net; Karen Toth; Anders, Krista (HEALTH); Cozzy, Robert (DEC); Quinn, James A (DEC); dimartino.john@epa.gov; RElder@renesco.com
Subject: Berlin Water District Letter
Attachments: Berlin Water District Letter.pdf

Dear Supervisor Robert Jaeger:

Please find the letter we discussed attached. Thank you.

Deanna Ripstein

Director of Strategic Priorities and Planning

New York State Department of Health
Center for Environmental Health
Empire State Plaza, Corning Tower Rm. 1629
Albany, NY 12237
518-486-7042
deanna.ripstein@health.ny.gov



Department of Health

ANDREW M. CUOMO
Governor

HOWARD A. ZUCKER, M.D., J.D.
Commissioner

SALLY DRESLIN, M.S., R.N.
Executive Deputy Commissioner

February 19, 2016

Supervisor Robert C. Jaeger
Town of Berlin
PO Box 307
Berlin, New York 12022

Re: Berlin Water District
Perfluorooctanoic Acid (PFOA) Sampling
(T) Berlin, Rensselaer County

Dear Supervisor Jaeger:

The NYS Department of Environmental Conservation (DEC) received notice from Tonoga, Inc. d/b/a Taconic (Taconic), identifying the presence of PFOA in groundwater at, and near, the Taconic facility in Petersburg, NY. After receiving notice, the NYS Department of Health (DOH) met at the Taconic facility with officials from the County, DEC, and representatives from Taconic. The purpose of the visit was to review groundwater sampling results collected by Taconic.

As part of its review of the PFOA contamination at Taconic, on February 13, 2016, the DOH collected samples at the Berlin Water District #2. Samples were collected from the north, south, and west wells representing untreated water. An additional sample was collected from a location within the distribution system representing finished water. The DOH's Wadsworth Center analyzed the samples for PFOA.

This letter confirms the preliminary results of this sampling. PFOA was detected in the water samples collected from the north, south, and west wells at concentrations of 10.3, 13.8, and 9.94 parts per trillion (ppt) respectively. PFOA was detected in the finish water sample at a concentration of 9.51 ppt. The most recent US Environmental Protection Agency (EPA) advisory level for PFOA in drinking water is 400 ppt, while EPA Region 2 has indicated that Hoosick residents should not drink water at 100 ppt.

Taconic is the closest potential source of PFOA. We are continuing to investigate the potential sources of the PFOA. Should you have questions, please contact me at (518) 402-7510.

Sincerely,

Robert Swider
Regional Environmental Health Director
Center for Environmental Health

From: Karen Toth
Sent: Wednesday, February 17, 2016 10:12 AM
To: 'david.phillips@health.ny.gov'
Subject: Taconic Filtration
Attachments: Carbon Filter Wells DOH Application & Approval.pdf

Hello David. I was just informed to notify you about our planned maintenance on our plant water wells.

We are performing a maintenance task tomorrow for our two existing plant wells #2 and #3, to replace the carbon in our existing approved tanks with the same amount of the DOH recommended F400 carbon.

For our plant well #1, the approved carbon tank was replaced with 3 carbon cartridges in early 2012. Tomorrow, we are going back to the original approved system, and replacing the 3 carbon cartridges with the approved 80 lb carbon tank, filling it with F400 carbon.

Please find attached the original application, design details, and approvals for these systems. Please let me know if you would like additional information to help expedite this process and feel free to call me anytime.

Thank you for your assistance.

Thank you.

Karen Toth
Environmental Manager
TACONIC
136 Coonbrook Road
Petersburgh, NY 12138
(518) 658-3202, 288
www.4taconic.com

Definition of Daily Average and Daily Maximum

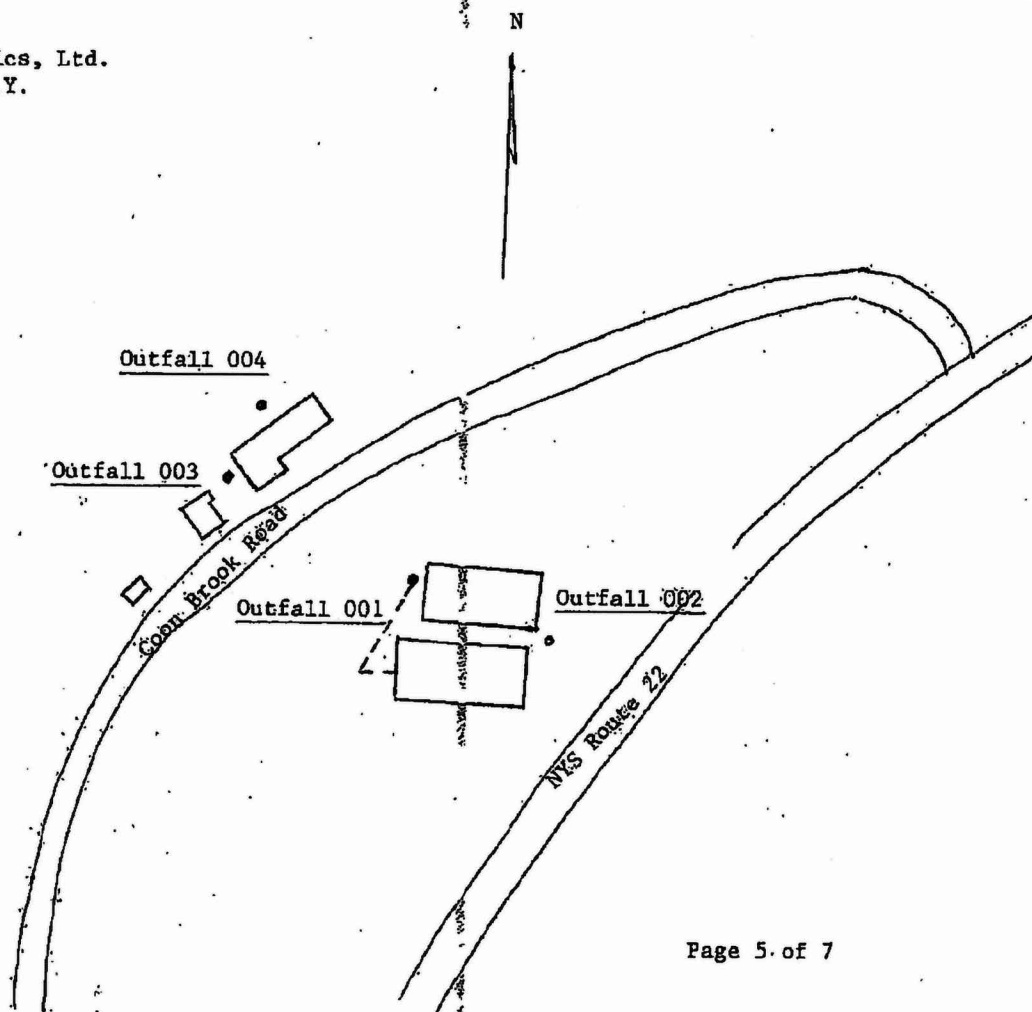
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Taconic Plastics, Ltd.
Petersburg, N.Y.

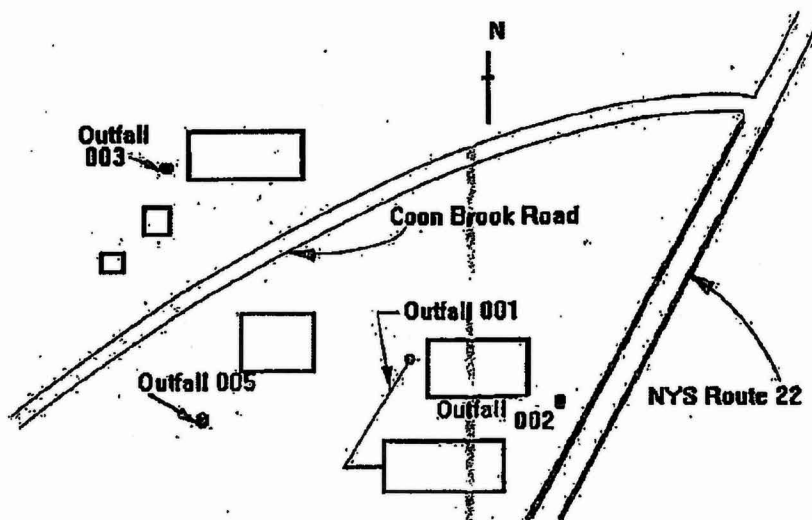


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Monitoring Locations

Permittee shall take samples and measurements to meet the monitoring requirements at the location(s) indicated on the sketch or flow diagram below.



12/13/97

TACONIC

136 Coonbrook Road • P.O. Box 69
Petersburgh, New York 12138
Telephone: 518.658.3202
Fax: 518.658.3204

August 3, 2005

Mr. John Dunn
Bureau of Water Supply Protection
New York State Department of Health
Flanigan Square
547 River Street
Troy, New York 12180

Dear Mr. Dunn:

Re: Taconic, Petersburg, NY

We have recently undertaken voluntary efforts to evaluate the presence and level of perfluorooctanoic acid (PFOA) at or near the Taconic facility. Attached please find copies of the laboratory analytical reports related to the presence of this compound in groundwater at or near the facility.

After you have had a chance to look through the enclosed, could you please contact me at your earliest convenience so that we can arrange a meeting to discuss this information? I can be reached at (518) 658-3202 ext. 288.

Sincerely,


Andrew Kawczak
Environmental Manager

c/ Mr. Richard Elder, Public Health Engineer
Rensselaer County Department of Health
1600 Seventh Avenue
Troy, NY 12180

DOHinfoLetter

TAC EPA 04775